

**REMARKS**

Claims 1-29 are pending. Claims 1, 10, 13, and 24 are in independent form.

As a threshold matter, Applicant thanks the Examiner for considering the references cited in the Information Disclosure Statement filed on March 15, 2004.

***Rejections under 35 U.S.C. § 102(e)***

Claim 1 was rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent Publication No. 2005/0140945 to Banine et al. (hereinafter "Banine").

Claim 1 relates to an apparatus that includes a plasma produced electromagnetic radiation source, one or more collector optics, and a magnetic field generator operative to generate a magnetic field around the one or more collector optics. The magnetic field generator includes windings around a non-reflective surface in the one or more collector optics.

Banine neither describes nor suggests a magnetic field generator that includes windings around a non-reflective surface in the one or more collector optics, as recited in claim 1.

In this regard, as shown in Banine's FIG. 6, magnetic coils MC1, MC2 are positioned inside collector optics Col. The winding of magnetic coils MC1, MC2 are thus not around a non-reflective surface in Banine's collector optics.

It is well-established that anticipation requires that a reference shows the recited subject matter "in as complete detail as is contained in the ... claim." See, e.g., *M.P.E.P.* §2131 (citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, (Fed. Cir. 1989)). In the present case, Banine fails to describe or suggest a magnetic field generator that includes windings around a non-reflective surface in the one or more collector optics, as recited in claim 1.

Accordingly, claim 1 is not anticipated by Banine.

Applicant respectfully requests that the rejections of claim 1 and the claims dependent therefrom be withdrawn.

Claim 10 was rejected under 35 U.S.C. § 102(e) as anticipated by Banine.

Claim 10 relates to an apparatus that includes a plasma produced electromagnetic radiation source, one or more collector optics, and a magnetic field generator operative to generate a magnetic field around the one or more collector optics. The magnetic field generator comprises a solenoid structure wrapped around a reflective surface in the one or more collector optics.

Banine neither describes nor suggests such a solenoid structure wrapped around a reflective surface in the one or more collector optics, as recited in claim 10. In this regard, as discussed above, Banine's magnetic coils MC1, MC2 are positioned

inside collector optics Col. The winding of magnetic coils MC1, MC2 are thus not wrapped around a reflective surface in Banine's collector optics.

Accordingly, claim 10 is not anticipated by Banine. Applicant respectfully requests that the rejections of claim 10 and the claims dependent therefrom be withdrawn.

Claim 13 was rejected under 35 U.S.C. § 102(e) as anticipated by Banine.

Claim 13 relates to a method that includes generating a magnetic field around collector optics in a lithography system with windings around a non-reflective surface in the collector optics, and deflecting debris particles generated by a plasma producing electromagnetic radiation source from a reflective surface in the collector optics.

Banine neither describes nor suggests generating a magnetic field around collector optics in a lithography system with windings around a non-reflective surface in the collector optics, as recited in claim 13.

In this regard, as discussed above, Banine's Banine's magnetic coils MC1, MC2 are positioned inside collector optics Col. The winding of magnetic coils MC1, MC2 are thus not around a non-reflective surface in Banine's collector optics.

Accordingly, claim 13 is not anticipated by Banine.

Applicant respectfully requests that the rejections of claim 13 and the claims dependent therefrom be withdrawn.

Claim 24 was rejected under 35 U.S.C. § 102(e) as anticipated by Banine.

Claim 24 relates to a method that includes generating a magnetic field around collector optics in a lithography system with a solenoid structure wrapped around a reflective surface in the collector optics, and deflecting debris particles generated by a plasma producing electromagnetic radiation source from a reflective surface in the collector optics.

Banine neither describes nor suggests generating a magnetic field around collector optics in a lithography system with a solenoid structure wrapped around a reflective surface in the collector optics, as recited in claim 24.

In this regard, as discussed above, Banine's magnetic coils MC1, MC2 are positioned inside collector optics Col. The winding of magnetic coils MC1, MC2 are thus not wrapped around a reflective surface in Banine's collector optics.

Accordingly, claim 24 is not anticipated by Banine.

Applicant respectfully requests that the rejections of claim 24 and the claims dependent therefrom be withdrawn.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue, or comment does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant asks that all claims be allowed. Please apply the RCE fee, the excess claims fee, and any credits or additional charges to deposit account 06-1050.

Respectfully submitted,



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